

AO 91 (Rev. 08/09) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Western District of Texas

United States of America )

ICAL-Caal, Y. Juan, Alberto )

and )

VARELA-Euceda, Mario, Noe )

Defendant(s)

Case No.

DR-18-3876M-01,02

FILED  
APR 30 2018  
CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

DEPUTY

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 4/28/2018 in the county of Dimmit in the  
Western District of Texas, the defendant(s) violated:

## Code Section

8 USC 1324

## Offense Description

Knowingly and intentionally combine, conspire, confederate and agree with others, to transport and move, and attempt to transport and move, aliens who entered and remained in the United States in violation of the law.

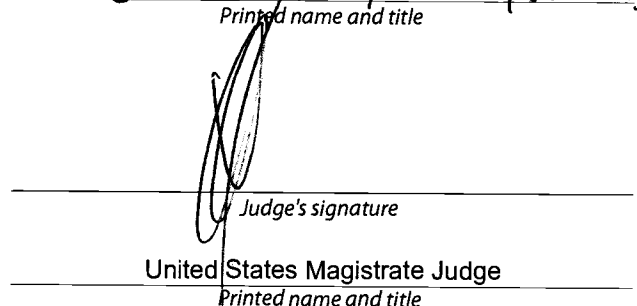
This criminal complaint is based on these facts:

On April 28, 2018, Dimmit County Sheriff's Office deputies conducted traffic stops on two vehicles that were driving in tandem on Highway 85 in Carrizo Springs, Texas. The first vehicle, a white Chevrolet truck driven by Juan ICAL-Caal, was stopped for having the wrong color stop lamps. The second vehicle, a black Dodge Ram, was stopped for failure to signal a lane change. DCSO deputies identified Christian Navarro as the driver of the Dodge Ram and Mario VARELA-Euceda as the passenger. During the traffic stop, the deputies requested assistance from the U.S. Border Patrol (USBP). USBP responded and conducted an immigration inspection that resulted in the identification of eleven illegal aliens (IA's) that were in the white Chevrolet. All occupants of both vehicles were transported to the Carrizo Springs Border Patrol Station for processing and further questioning. Homeland Security Investigations (HSI) Eagle Pass special agents responded to the station and interviewed ICAL-Caal. ICAL-Caal stated he transported the IA's to help VARELA-Euceda, who provided him the white Chevrolet. ICAL-Caal stated he followed VARELA-Euceda, who was in the black Dodge Ram, to a stash house located in Eagle Pass, Texas, where ICAL-Caal picked up the ten IA's with the intention of transporting them to San Antonio, Texas. ICAL-Caal stated he assumed VARELA-Euceda would pay him approximately \$1,000 or \$2,000 USD for helping him transport the IA's. ICAL-Caal identified VARELA-Euceda, on a six panel photographic line-up.

☐ Continued on the attached sheet.
  
Complainant's signature

Omar Cantu, HSI Special Agent  
Printed name and title

Sworn to before me and signed in my presence.

Date: 4/30/2018City and state: Del Rio, Texas
  
Judge's signature  
United States Magistrate Judge  
Printed name and title